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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	
)	Chapter 11
TERRESTAR CORPORATION, <i>et al.</i> , ¹)	
)	Case No. 11-10612 (SHL)
Debtors.)	
)	
)	

**NOTICE OF APPEARANCE AND
REQUEST FOR NOTICES AND SERVICE OF PAPERS**

PLEASE TAKE NOTICE that **HIGHLAND CAPITAL MANAGEMENT, L.P.** and certain of its managed and affiliated funds (collectively, “Highland”) hereby appear in the above-captioned case by their undersigned counsel and request, pursuant to Rules 2002, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure, that all notices given or required to be given in connection with the above-captioned case, and all papers served or required to be served in connection therewith (including, but not limited to, all papers filed and served in all adversary proceedings, contested matters and other proceedings in the above-captioned case, and all notices mailed only to parties in interest who filed with the Court a request that all notices be mailed to them), be given and served upon:

¹ The debtors in these chapter 11 cases, along with the last four digits of each debtor’s federal taxpayer-identification number, are: (a) TerreStar Corporation [6127] and TerreStar Holdings Inc. [0778] (collectively, the “**February Debtors**”); and (b) TerreStar New York Inc. [6394]; Motient Communications Inc. [3833]; Motient Holdings Inc. [6634]; Motient License Inc. [2431]; Motient Services Inc. [5106]; Motient Ventures Holding Inc. [6191]; and MVH Holdings Inc. [9756] (collectively, the “**Other TSC Debtors**” and, collectively with the February Debtors, the “**TSC Debtors**”).

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PLEASE TAKE FURTHER NOTICE that the foregoing request includes, without limitation, any and all notices in respect of any application, motion, petition, pleading, request, complaint, demand, order or any other paper filed in the proceeding whether such notice is formal or informal, written or oral, and whether transmitted by hand delivery, United States Mail, electronic mail, expedited delivery service, telephone, telex, telecopy or otherwise.

PLEASE TAKE FURTHER NOTICE that the identified attorneys from Wachtell, Lipton, Rosen & Katz (Scott K. Charles, Esq. and Alexander B. Lees, Esq.) consent to email service.

This appearance and request for notice and service of papers is not, and may not be deemed or construed to be, a consent to jurisdiction of the Court over Highland. This appearance and demand for notice and service of papers is not, and may not be deemed or construed to be, a waiver of any of Highland's substantive or procedural rights, including without limitation: (i) Highland's right to have final orders in non-core matters entered only after *de novo* review by a District Court; (ii) Highland's right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) Highland's right to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, set-offs or recoupments to which Highland is or may be entitled under any agreement, in law or in equity, which rights, claims, actions, defenses, set-offs and recoupments Highland expressly reserves.

Dated: February 24, 2011
New York, New York

WACHTELL, LIPTON, ROSEN & KATZ

/s/ Scott K. Charles

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